

ALBERT Y. DAYAN

80-02 Kew Gardens Rd., #902, Kew Gardens, N.Y. 11415

Attorney at Law

Tel: (718) 268-9400: Fax: (718) 268-9404

By E-mail and ECF

July 7, 2021

The Honorable LaShann DeArcy Hall
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Alex Levin et al.
Criminal Docket No. 21-208 (LDH)

Dear Judge DeArcy Hall:

By this letter, Alex Levin, by and through his counsel, is respectfully asking this Honorable Court to modify his current conditions of release from home confinement with allowance for travel for work only, to a non home confinement conditions of supervised release limited to travel within the tri state area. The Government does not object to said request. (Please See, Original Order Setting Conditions of Release and Appearance Bond dated April 20, 2021, attached hereto).

Mr. Levin was arrested without incident on this matter from his home on April 20, 2021. Unlike other defendants in this matter, no search warrant was executed on Mr. Levin's residence and no liens were placed on any of his assets and/or bank accounts by the government in this case. Immediately after Mr. Levin's arrest, counsel for defendant and government consented on the current bail package without objection by the pretrial office.

After numerous discussions with the government in this case, specifically on the subjects of discovery, possible dispositions, Mr. Levin's alleged role in the alleged conspiracy, combined with Mr. Levin's family dynamics and his ongoing responsibilities outside his residence and work, the government does not appose modifying the current conditions of his release to supervised release with the following conditions; Mr. Levin must remain in and may not leave New York City without Court permission; Mr. Levin must avoid all contact with co-defendants in this case except in the presence of counsel; Mr. Levin must have surrendered all passports to pretrial services by 4/22/21; Mr. Levin is subject to random visits by Pretrial Services officer at defendant's residence and place of work; Mr. Levin must report as directed by Pretrial Services; Mr. Levin must undergo evaluation and treatment for mental health problems, as directed by Pretrial Services.

The respected office of Pretrial Services apposes Mr. Levin's present request for the modification of his conditions for release without a hearing because, in their own words to the undersigned, there has not been a change of circumstance sufficient to modify the conditions of his release. However, with respect to the position taken by Pretrial Offices, they were not party to the original consent reached by government and defense on pretrial conditions for release, and, respectfully, they are not now privy to the discussions had between government and defense on the subjects of possible dispositions, discovery, Mr. Levin's alleged role in the alleged conspiracy, combined with Mr. Levin's family dynamics and his ongoing responsibilities outside his residence that has served as the basis of the current request.

For the forgoing reasons we are respectfully requesting that this Honorable Court modify Mr. Levin's conditions for release on consent with the government without a hearing.

Thank you Your Honor.

Respectfully submitted,

Sgd: *Albert Y. Dayan*
Albert Y. Dayan
Attorney at Law